

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

NICHOLAS BARNARD

Plaintiffs,

v.

COLUMBIA DEBT RECOVERY, LLC, dba
GENESIS,

Defendants.

CASE NO.

NOTICE OF REMOVAL

(CLERKS ACTION REQUIRED)

TO: THE CLERK OF THE COURT
UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

Defendant, Columbia Debt Recovery, LLC, by and through its attorney, states:

1. An unfiled Summons and Complaint in the above action was served with on Defendant on May 1, 2020.

2. Pursuant to 28 U.S.C. §1446(b), this Notice of Removal is filed within thirty (30) days after service of the Summons and Complaint.

3. Plaintiffs have alleged violations of the Fair Debt Collection Practices Act, 15 U.S.C. §1692 *et seq.* This Court has federal question jurisdiction over the subject matter of this action pursuant to 28 U.S.C. §1331.

NOTICE OF REMOVAL - 1

Mark T. Case, WSBA #38589
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6 5. **Intra-district Assignment:** Defendant request that the Court assign the
7 above captioned case to its Seattle Division. Plaintiffs are individuals believed to be
8 residing in Seattle, Washington. The principal place of business of Defendant Columbia
9 Debt Recovery LLC is in Snohomish County, Washington. The alleged claims took place
10 in King and/or Snohomish County. The state court where Plaintiffs commenced the above
11 captioned case is in King County. Venue is proper in the Seattle Division. 28 U.S.C.
12 §1441(a)
13

COLUMBIA DEBT RECOVERY, LLC

/s/ Mark T. Case
Mark T. Case, WSBA # 38589
Attorney for Columbia Debt Recovery LLC
P.O. Box 30131
Spokane, WA 99223
Telephone: (425) 890-2817
Facsimile: (425) 646-1395
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I certify under penalty of perjury of the laws of the State of Washington that on the date set forth below, I caused to be served true and correct copies of the forgoing to the parties listed below:

Name and Address of Party Served	Method of Service:						
T. Tyler Santiago, WSBA #46004 Anderson Santiago 787 Maynard Ave. S Seattle, WA. 98104 206-395-2665 Email: tyler@alkc.net Jason Anderson, WSBA #38014 Anderson Santiago 787 Maynard Ave. S Seattle, WA. 98104 206-395-2665 Email: jason@alkc.net <i>Attorneys for Plaintiffs</i>	<table><tr><td>Personal Service</td></tr><tr><td>First Class US Mail</td></tr><tr><td>Certified Mail</td></tr><tr><td>X Electronic Mail</td></tr><tr><td>Facsimile</td></tr><tr><td>Legal Messenger</td></tr></table>	Personal Service	First Class US Mail	Certified Mail	X Electronic Mail	Facsimile	Legal Messenger
Personal Service							
First Class US Mail							
Certified Mail							
X Electronic Mail							
Facsimile							
Legal Messenger							

Dated in Spokane this 15 day of April, 2020.

/s/ Mark T. Case
 Mark T. Case, WSBA # 38589
 Attorney for Columbia Debt Recovery LLC